

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

WEARABLE SHOE TREE LLC,

Plaintiff,

v.

DOES 1-601,

Defendants.

Civil Action No. 4:24-cv-334-SDJ

**PLAINTIFF’S MOTION FOR AMENDED FINAL JUDGMENT**

In its March 20, 2025 Final Judgment order (the “Order,” Dkt. 93), the Court granted Plaintiff’s Motion for Default Judgment and Permanent Injunction (Dkt. 59) in part. Although the Order does award judgment in favor of Plaintiff in the amount of \$1,000 in statutory damages against the Defaulting Defendants in Appendix 1 (“Judgment Award”), the Order does not provide Plaintiff with a means of collecting said amount in satisfaction of the judgment.

Specifically, the Order does not instruct the ecommerce platform providers, such as Alibaba, AliExpress, Amazon, Bonanza, DHgate, eBay, Etsy, Joom, Joybuy, Shein, Shopify, Temu, Walmart, and Wish (collectively the “Platforms”) or payment processors, such as PayPal, Payoneer, Stripe, WorldFirst, Bill.com, Pingpong, Payeco, Umpay/Union Mobile Pay, Moneygram, Western Union, or other bank accounts or payment processors used by the Defaulting Defendants (collectively the “Payment Processors”) to release to Plaintiff the Judgment Award from the Defaulting Defendants’ Platform or Payment Processor accounts. Plaintiff therefore provides the Court with the attached proposed amended final judgment in hopes of securing

authority for the Platforms and Payment Processors to assist Plaintiff in recovering the Judgment Award from the Defaulting Defendants.

Dated: April 9, 2025

Respectfully submitted,

**SCALE LLP**

By: /s/ Charles A. Wallace  
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ATTORNEYS FOR PLAINTIFF  
WEARABLE SHOE TREE LLC

**CERTIFICATE OF SERVICE**

I certify that on April 9, 2025, I caused a true and correct copy of the foregoing document to be filed on the Court's CM/ECF system, which served notice on all counsel of record.

By: /s/ Charles A. Wallace  
Charles A. Wallace

**CERTIFICATE OF CONFERENCE**

None of the Defaulting Defendants have appeared in this case, and therefore, pursuant to Local Rule 7(G), undersigned counsel states that he is unable to meet and confer with Defaulting Defendants and unable to state whether this motion is opposed.

/s/ Charles A. Wallace  
Charles A. Wallace